

# STAPLETON SEGAL • COCHRAN

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March 26, 2025

**Via ECF**

The Honorable Christine P. O'Hearn  
Mitchell H. Cohen Building & U.S. Courthouse  
United States District Court for the  
District of New Jersey  
4<sup>th</sup> & Cooper Streets, Room 6050  
Camden, NJ 08101

**Re: Ireland & Bade v. Hegseth, et al.**  
**Civ. A. No. 25-1918-CPO-AMD**

Dear Judge O'Hearn,

This letter responds to the letter filed by Defendants on March 25, 2025, ECF 30. To the extent the Court treats Defendants' letter as a motion to stay the Court's Temporary Restraining Order entered on March 24, 2025, Plaintiffs oppose Defendants' request, which would eliminate the relief Plaintiffs sought and leave Master Sergeant Ireland and Staff Sergeant Bade in the same unprotected position they were in when they sought emergency relief.

Defendants' letter makes clear that the only Order protecting Plaintiffs' status quo at this time is in fact this Court's March 24, 2025, Temporary Restraining Order. Pursuant to the Office of the Secretary of Defense's February 28, 2025, *Clarifying Guidance*, ECF 13-8, in the absence of this Court's TRO, Plaintiffs risk the initiation of administrative separation proceedings as early as March 26, 2025, or, at latest, March 28, 2025. *See also* March 21, 2025, Memorandum, ECF 26-1. Put simply, over the next three days, during which Defendants request a stay of the Court's TRO, there remains an immediate threat of irreparable harm to Master Sergeant Ireland and Staff Sergeant Bade. *See, e.g.*, March 21, 2025, Memorandum, ECF No. 24-1 ("Service members identified . . . will be processed for involuntary separation.").

Respectfully,



John G. Grogan  
Langer Grogan & Diver P.C.



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cc: All counsel of record